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July 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation by the Association for Local
Telecommunications Services, the Competitive Telecommunications
Association, and the Personal Communications Industry Association**

Numbering Resource Optimization – CC Docket No. 99-200

Dear Ms. Salas:

Pursuant to Sections 1.1206(b)(1) and (2) of the Commission's Rules, the Association for Local Telecommunications Services ("ALTS"), the Competitive Telecommunications Association ("CompTel"), and the Personal Communications Industry Association ("PCIA") submit this notice in the above-referenced proceeding of an *ex parte* meeting on July 28, 2000 between Rebecca Beynon, Legal Advisor to Commissioner Furchtgott-Roth, Federal Communications Commission, and Harold Salters, Director, Government Relations, PCIA, Teresa Gaugler, ALTS, and Todd Daubert, Kelley Drye & Warren.

During the meeting, ALTS, CompTel and PCIA discussed the critical need for a 90-day extension of the August 1, 2000 deadline for submitting FCC Form 502. In particular, ALTS, CompTel and PCIA noted that support for an extension is broadly based, encompassing *all* segments of the telecommunications industry. In addition to ALTS, CompTel and PCIA, who jointly filed a motion for extension on behalf of the CLEC and wireless industries, USTA

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filed a Petition for Waiver on July 27, which likewise seeks a 90-day extension, on behalf of the ILECs. Several other carriers and associations, including BellSouth, Cincinnati Bell, Electric Lightwave, Inc., Intermedia, PRTC, Qwest, Rural Cellular Association/OPASTCO/NTCA, VoiceStream and WinStar, have also sought extensions.

During the meeting, ALTS, CompTel and PCIA reaffirmed their support for a single national point of contact for the reporting of numbering utilization data. However, the data submitted on FCC Form 502 must be accurate and complete so that the FCC, NANPA and state commissions will be able to make effective choices about area code relief, numbering optimization measures, and numbering administration in general. ALTS, CompTel and PCIA explained that the 90-day extension is necessary to ensure that the data submitted on FCC Form 502 is accurate and complete.

The logistical complexity of assembling the required numbering utilization data, populating FCC Form 502 or NeuStar's Electronic File Transfer ("EFT") format with this data, and transmitting FCC Form 502 to the EFT to NANPA is very substantial. Although the internal systems of individual carriers differ, most – if not all – carriers have been forced to implement significant modifications to their internal systems. These modifications are necessary because most systems (1) did not support the six new primary categories of numbering utilization, (2) could not automatically update the status of numbers on an automated basis, or (3) generate data in a format that is consistent with FCC Form 502. Most carriers have also been forced to audit their numbering inventory on a number by number basis because the six new primary categories and definitions of number use are not consistent with the industry guidelines that were in place before the FCC adopted the *Report and Order*. Many of these carriers have been forced to perform this review and reclassification manually, which is highly labor intensive and time consuming.

This task has been further complicated for many carriers by the fact that the EFT format, which itself is more than 20 pages long, that carriers must use to file electronically was not available until only seven business days before the filing deadline. Moreover, the testing and auditing of the numbering utilization data that each carrier must perform before submitting FCC Form 502 is another resource intensive task made all the more difficult by the fact that the Form 502 itself has been altered as recently as Wednesday, July 26, 2000. (See NANPA website listing changes). The latest versions of the Forms U3 and U4 may in fact still contain errors that cause an error message to be displayed when intermediate carriers make numbers available to other carriers or non-carrier entities under certain circumstances. ALTS, CompTel and PCIA explained that the requested 90-day extension would help to ensure that carriers submit accurate and complete numbering utilization data.

Pursuant to Sections 1.1206(b)(1) and (2), an original and two copies of this *ex parte* notification are provided for inclusion in the public record of the above-referenced

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proceeding. We would be pleased to provide additional copies of the paper and its attachment, upon request. Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd D. Daubert", with a long horizontal flourish extending to the right.

Todd D. Daubert
Counsel to ALTS, CompTel and PCIA

cc: International Transcription Services
Rebecca Beynon